

## MEMO

**TO:** Meghan Nelson, Chief Clerk of the House  
W. Charles Smithson, Secretary of the Senate  
Ron Parker, Senate Democratic Caucus Staff Director  
Gannon Hendrick, Senate Republican Caucus Staff Director  
Joe Romano, House Democratic Caucus Staff Director  
Jeffrey Mitchell, House Republican Caucus Staff Director  
Jacob Swanson, Governor's Office

**FROM:** Ralph Lents, Chair, Environmental Protection Commission

**Cc:** Kayla Lyon, Director, Department of Natural Resources  
Tammie Krausman, Legislative Liaison, Department of Natural Resources

**DATE:** November 19, 2019

**RE:** Recommendation to extend the Mercury-Added Switch Recovery Program From End-of-life Vehicles; Iowa Code sections 455B.801 through 455B.809

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On behalf of the Environmental Protection Commission (EPC), I am pleased to provide this recommendation regarding the necessity of continuing the implementation of the Mercury-Added Switch Recovery Program for the removal, collection and recovery of mercury-added switches from end-of-life vehicles as is required by Iowa Code section 455B.803, subsection 2, paragraph "e". This recommendation was approved unanimously at the November 19 meeting of the EPC.

**Recommendation:** The EPC recommends extending the sunset date of this program from July 1, 2020 to December 31, 2021. Although the number of mercury switches available for collection is diminishing each year, there are still a significant number of mercury switches in vehicles that will be retired that can be recovered. Extending the program for 18 months will make Iowa's program coincide with a voluntary national program.

**Background:** Mercury switches were used in convenience lighting (hood and trunk lights) in vehicles as recently as 2002. If the mercury switches are not removed when the vehicle is retired, the mercury is released to the environment when the metal is recycled. The Mercury-Free Recycling Act requires auto manufacturers to implement a system to recover mercury switches from scrap vehicles before they are crushed or shredded for recycling. Vehicle manufacturers are responsible for all of the costs of the system including labor to remove the switches, packaging, shipping, recycling or disposal, training for program participants and public education. Vehicle recyclers receive \$5 per switch reimbursement from vehicle manufacturers for their labor to remove the switches.

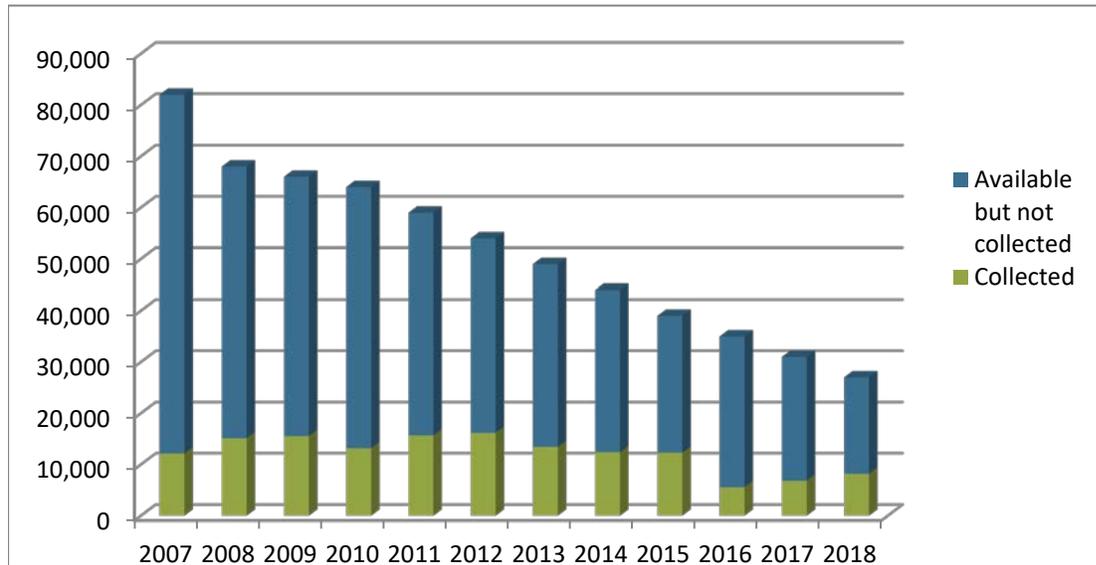
Figure 1: Mercury-added switch from a hood light



Several months after the Mercury Free Recycling Act was passed, a collaborative effort involving government and industry trade groups resulted in an agreement to establish a voluntary, nationwide program to recover mercury switches. This agreement, called the National Vehicle Mercury Switch Recovery Program (NVMSRP), originally expired in 2017 but was extended to the end of 2021. To carry out their responsibilities to collect, transport, recycle, or dispose of elemental mercury from automotive switches for the NVMSRP and in Iowa and a few other states with similar legislated programs, the vehicle manufacturers formed End-of-Life Vehicle Solutions (ELVS).

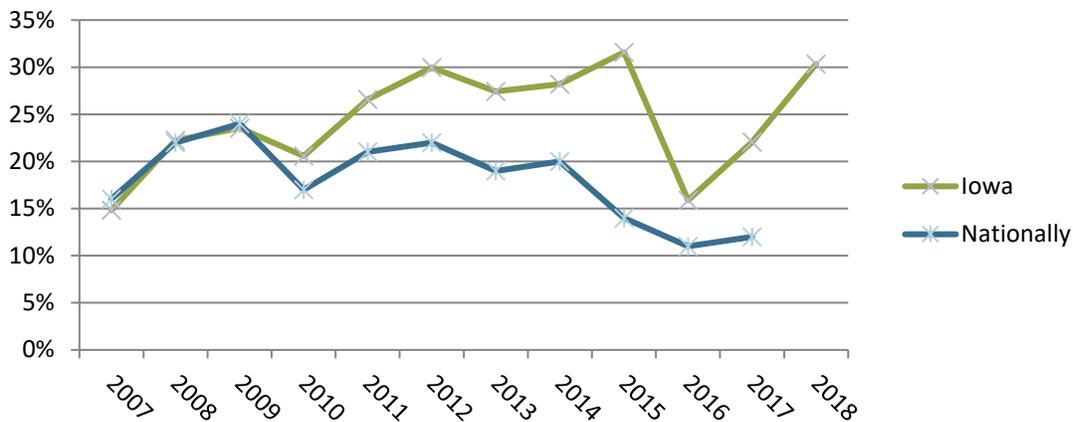
**Success of the program:** Over the course of the program, Iowa vehicle recyclers have removed over 150,000 switches containing over 330 pounds of mercury. Table 1 shows the number of switches collected each year compared to the number of switches estimated to be in the pool of cars recycled that year.

**Table 1: Number of mercury-added switches collected and available for collection but not collected by year.**



**Need to extend:** ELVS will continue to collect and properly dispose of mercury-added switches through the end of 2021. If Iowa’s program is allowed to sunset as scheduled on July 1, 2020, Iowa’s vehicle recyclers would still be able to have their switches recycled. However, the \$5 reimbursement for the labor of removing the switches from the vehicles and the requirement that all mercury-added convenience lighting switches be removed from vehicles prior to recycling would end. These two elements have been driving forces behind the success of Iowa’s program. As Table 2 shows, Iowa’s program has significantly outperformed the national program since 2010.

**Table 2 Percent of Switches Recovered Nationally and in Iowa**



Although the number of mercury-added switches available for recycling is declining each year, ELVS estimates that vehicles retired in Iowa in 2020 and 2021 will contain 37,000 mercury added switches, each containing approximately a gram of mercury.

Please contact DNR Legislative Liaison Tammie Krausman if you have any questions regarding this recommendation to extend the Mercury-Added Switch Recovery Program. She may be reached at 515-402-8763 or [Tammie.Krausman@DNR.iowa.gov](mailto:Tammie.Krausman@DNR.iowa.gov).